

1 PHILLIP A. TALBERT
United States Attorney
2 AUDREY B. HEMESATH
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5

6 Attorneys for Plaintiff
United States of America

7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,	CASE NO. 2:21-CR-207 TLN
12 Plaintiff,	STIPULATION AND ORDER RE:
13 v.	CONTINUANCE OF STATUS CONFERENCE
14 KI JANG,	
15 Defendant.	

16

17 The United States and the defendant stipulate as follows:

18 1. By previous order, this matter was set for status conference on September 7, 2023.

19 2. By this stipulation, defendant now moves to continue the hearing to November 30, 2023,
20 at 9:30 a.m.. The defendant and the government (the “parties”) also jointly move to exclude time
21 between September 7, 2023, and November 30, under Local Code T4.

22 3. The parties agree and stipulate, and request that the Court find the following:

23 a) The government has represented that the discovery associated with this case
24 includes approximately 30,000 pages of law enforcement reports, bank records, photographs,
25 audio recordings, and search warrant items. All of this discovery has been either produced
26 directly to counsel and/or made available for inspection and copying.

27 b) Counsel for defendant desires additional time to consult with his client, to review
28 the current charges, to conduct investigation and research related to the charges, to review

1 discovery for this matter, to discuss potential resolutions with her client, and to otherwise prepare
2 for trial.

3 c) Mr. Jang requires the use of a Korean language interpreter, which requires
4 scheduling, and slows review of the discovery materials.

5 d) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny them the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 e) The government does not object to the continuance.

9 f) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of September 7, 2023 to November
14 30, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendant's request on the basis
16 of the Court's finding that the ends of justice served by taking such action outweigh the best
17 interest of the public and the defendant in a speedy trial.

18 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
20 must commence.

21
22 IT IS SO STIPULATED.

23
24 Dated: August 30, 2023

PHILLIP A. TALBERT
United States Attorney

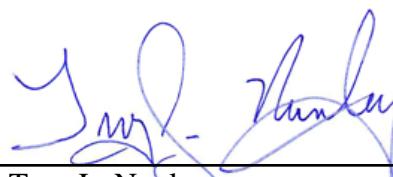
25
26 /s/ Audrey B. Hemesath
27 Audrey B. Hemesath
28 Assistant United States Attorney

1
2 Dated: August 30, 2023
3
4
5
6
7

/s/ CHRISTOPHER COSCA
CHRISTOPHER COSCA
Counsel for Defendant
Ki Jang

ORDER

IT IS SO FOUND AND ORDERED this 31st day of August, 2023.



9
10
11 Troy L. Nunley
12 United States District Judge
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28